

**DECLARATION OF AURORE IN SUPPORT OF PLAINTIFF’S SUPPLEMENTAL
MOTION FOR SANCTIONS**

I, Aurore Sims, declare as follows:

Background

I am the Plaintiff in the above-captioned matter. I submit this declaration in support of my supplemental motion for sanctions against Defendant’s counsel, Mr. Liebrader due to his continued violations of the Court’s procedural rules and ethical obligations. I have personal knowledge of the facts set forth herein, and if called upon, I could and would testify competently to these facts.

Initial Motion for Sanctions and Defendant's Continued Violations

On 01/12/25, I filed an initial motion for sanctions based on Defendant’s counsel’s repeated violations of the procedural rules. Despite this motion and the Court’s warnings, Defendant’s counsel has continued to disregard the Court’s rules. Specifically, he has repeatedly filed consolidated motions in a single document, in violation of the Court’s requirement that distinct motions be filed separately.

Defendant's Counsel’s Misconduct in Recent Filings

As outlined in the previous motion for sanctions, Defendant’s counsel’s actions have continued in violation of the Court’s rules. Notably, in ECF No. 41, 97 and 107 Defendant’s counsel improperly consolidated multiple motions, including a reply and counter-motion, into a single filing. This has resulted in unnecessary confusion and inefficiency in the case proceedings.

Failure to Heed Court's Warnings

The District Judge, in ECF No. 98, issued a formal warning to Defendant's counsel about the ongoing violations of procedural rules. Despite this warning, Defendant's counsel has not corrected his conduct and has continued to consolidate multiple motions into a single filing, hindering the smooth progression of this case.

Harm Caused by Continued Violations

Defendant's counsel's disregard for the Court's procedural requirements has caused significant disruption in the case. These violations have led to confusion, wasted judicial resources, and unnecessary delays. Furthermore, they have complicated the record and made it more difficult to address the distinct issues raised in the case.

Falsely Asserting Third-Party Filings: Mr. Liebrader falsely claims that third parties have filed motions and documents on my behalf. This behavior is not only unsubstantiated but also designed to discredit my filings and undermine the integrity of the legal proceedings.

Inappropriate Use of Clerical Errors: In his opposition, ECF 107, Mr. Liebrader has used clerical mistakes in New York Complaint made by court staff as a tool to question the authenticity of my filings, which further reflects his pattern of making baseless accusations and attempting to distract from the merits of the case.

Supplemental Motion for Sanctions

Given Defendant's counsel's continued misconduct, I respectfully seek to supplement my initial motion for sanctions to account for these ongoing violations. This supplemental motion will provide the Court with updated information regarding Defendant's counsel's continued non-compliance and the harm caused as a result. (Exhibit 1).

Efforts to Comply with Court Rules

In contrast to Defendant's counsel, I have made consistent efforts to comply with the Court's rules and correct my mistakes. For example, in my filings, including ECF Nos. 104 and 105. I have ensured that separate motions are filed in accordance with the Court's procedural requirements, in order to assist the Court in maintaining an orderly and efficient process.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted,

Date 2/20/2025



Signature: _____

Aurore Sims